

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

JUDY DILLEY,)	
)	
Plaintiff,)	
)	
v.)	No. 16-cv-91 - SLC
)	
HOLIDAY ACRES STABLES,)	
HOLIDAY ACRES PROPERTIES,)	
INC, and STEVE KRIER,)	
)	
Defendants.)	

PLAINTIFF'S SUPPLEMENTAL DISCLOSURE OF EXPERT WITNESSES

NOW COMES plaintiff, Judy Dilley, by and through her undersigned counsel and pursuant to Federal Rule of Civil Procedure 26(a)(2) discloses as follows:

A. Retained Expert Witnesses:

Jan Dawson: Fentress, Texas: Is expected to testify consistent with the opinions expressed in her report outlining the conduct by Holiday Stables (and as a result Holiday Acres Resorts) which resulted in the severe injuries sustained by the plaintiff on July 25, 2016. Ms. Dawson has been involved with horses for over 50 years and has taught safety and liability workshops, seminars and lectured around the United States. She has published numerous books on equine safety. Her report with curriculum vitae, rate sheet and testimony list was previously filed.

B. Non-Retained Experts:

Plaintiff may present opinion testimony from one or more of the physicians who treated Judy Dilley for her injuries. None of these witnesses are retained experts. The subject matter for these witnesses' testimony will relate to medical and/or health care provided to Ms. Dilley, including but not limited to diagnosis, causation, treatment, prognosis, nature, extent and duration of the injury, past and future pain and suffering; past and future disability, including any work restrictions necessitated by the injury; necessity of medical treatment, past and future; and

reasonableness and necessity of medical expenses; and any other matters set forth in the medical records produced to date and in their depositions. The non-retained experts will also testify as to the fairness and reasonableness of the medical bills.

Their records have been previously furnished to defendant:

Ms. Diane Berghammer, EMT of Oneida County Ambulance, 2251 North Shore Dr., Rhineland, WI 54501;

Will testify as to her opinions regarding the condition of the plaintiff at the time the EMT's arrived at the scene, medical treatment provided, statements made by those present, the urgency of plaintiff's need for medical care, the authenticity of the EMT records, and any other opinions set forth in the medical records and her deposition.

Angela Denil, RN and Robert Bowen, EMT of Ministry Spirit Medical Transportation, 3375 Airport Rd., Rhineland, WI 54501;

Will testify as to their opinions regarding the condition of the plaintiff at the time the EMT's arrived St. Joseph's Hospital, the medical treatment provided, statements made by those present, the urgency of plaintiff's need for medical care, the authenticity of the EMT records, and any other opinions set forth in the medical records and her deposition.

Dr. Vildana Omerovic, Ministry St. Joseph's Hospital/Marshfield Clinic, 611 St. Joseph Ave., Marshfield, WI 54449;

Will offer opinions regarding the trauma and sustained by plaintiff, the nature and cause of the trauma she sustained, the medications she received, the pain she experienced, expected prognosis, residual ongoing pain and deficits, and any other opinions consistent with the medical records and depositions. Dr. Omerovic will offer medical opinions consistent with his area of expertise within a reasonable degree of medical certainty regarding his treatment of and conclusions about Ms. Dilley.

Dr. Vivekananda Goniugunta, Ministry St. Joseph's Hospital/Marshfield Clinic, 611 St. Joseph Ave., Marshfield, WI 54449;

Will offer opinions regarding the trauma and sustained by plaintiff, the nature and cause of the trauma she sustained, the medications she received, the pain she experienced, expected prognosis, residual ongoing pain and deficits, and any other opinions consistent with the medical records and depositions. Dr. Goniugunta will offer medical opinions consistent with his area of expertise within a reasonable degree of medical certainty regarding his treatment of and conclusions about Ms. Dilley.

Dr. Waltonen, Ministry St. Joseph's Hospital/Marshfield Clinic, 611 St. Joseph Ave., Marshfield, WI 54449;

Will offer opinions regarding the trauma and injuries sustained by plaintiff, the nature and cause of the trauma she sustained, the medications she received, the pain she experienced, expected prognosis, residual ongoing pain and deficits, and any other opinions consistent with the medical records and depositions. Dr. Waltonen will offer medical opinions consistent with his area of expertise within a reasonable degree of medical certainty regarding his treatment of and conclusions about Ms. Dilley.

Dr. William Raino, 2204 Eastland Dr., Bloomington, IL 61701;

Will offer opinions regarding the trauma and injuries sustained by plaintiff, the nature and cause of the trauma she sustained, expected prognosis, residual ongoing pain and deficits, and any other opinions consistent with the medical records and depositions. Dr. Raino will offer medical opinions consistent with his area of expertise within a reasonable degree of medical certainty regarding his treatment of and conclusions about Ms. Dilley.

Dr. Ira Halperin, College Internal Medicine, 1701 E. Colleger Ave., Bloomington, IL 61701;

Will offer opinions regarding the trauma and injuries sustained by plaintiff, the nature and cause of the trauma she sustained, expected prognosis, residual ongoing pain and deficits, the effect of the trauma on prior unsymptomatic medical conditions, and any other opinions consistent with the medical records and depositions. Dr. Halperin will offer medical opinions consistent with his area of expertise within a reasonable degree of medical certainty regarding his treatment of and conclusions about Ms. Dilley.

Dr. Seibly, Central Illinois NeuroHealth Sciences, 1015 S. Mercer Ave., Bloomington, IL 61701;

Will offer opinions regarding the trauma and injuries sustained by plaintiff, the nature and cause of the trauma she sustained, expected prognosis, residual ongoing pain and deficits, the effect on prior unsymptomatic medical conditions, interpretations of and any other opinions consistent with the medical records and depositions. Dr. Seibly will offer medical opinions consistent with his area of expertise within a reasonable degree of medical certainty regarding his treatment of and conclusions about Ms. Dilley.

Dr. Ricardo Vallejo, Millennium Pain Center, 1015 S. Mercer Ave., Bloomington, IL 61701;

Will offer opinions regarding the trauma and injuries sustained by plaintiff, expected prognosis, residual ongoing pain and deficits, and any other opinions consistent with the medical records and depositions. Dr. Vallejo will offer medical opinions consistent with his area of expertise

within a reasonable degree of medical certainty regarding his treatment of and conclusions about Ms. Dilley.

Mr. Edward Hodel, IV, formerly of Athletico Physical Therapy, 1704 Eastland Dr., Suite 15, Bloomington, IL 61704.

Will offer opinions regarding the trauma and injuries sustained by plaintiff, expected prognosis, treatment provided, residual ongoing pain and deficits, and any other opinions consistent with the physical therapy records and deposition.

Plaintiff reserves the right to elicit testimony in the form of opinions from any witnesses disclosed by defendant. Plaintiff may utilize any witness opinions at trial disclosed in depositions.

ARMBRUSTER, DRIPPS,
WINTERSCHIEDT & BLOTEVOGEL, LLC

By: /s/ Courtney C. Stirrat

Roy C. Dripps #6182013

Courtney C. Stirrat #6305084

51 Executive Plaza Court

Maryville, IL 62062

618/208-0320

F: 800/927-1529

royd@adwblaw.com

courtneys@adwblaw.com

ATTORNEYS FOR PLAINTIFF JUDY DILLEY

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

JUDY DILLEY,)	
)	
Plaintiff,)	
)	
v.)	No. 16-cv-91 - SLC
)	
HOLIDAY ACRES STABLES,)	
HOLIDAY ACRES PROPERTIES,)	
INC, and STEVE KRIER,)	
)	
Defendants.)	

PROOF OF SERVICE

I hereby certify that on February 20, 2017, Plaintiff's Federal Rule of Civil Procedure 26(a)(2) Expert Disclosures was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all parties entered in the case; and

on February 21, 2017 by US Mail to defendant Steve Krier, pro se to: 28 Cooney Rd., Roberts, Montana 59070.

/s/ Courtney C. Stirrat